

We at TBK Bank, SSB (“TBK,” “Triumph,” “we,” “us,” or “our”) have created this Online Privacy Policy (“policy”) because we know that you care about how information you provide to us is used and shared. This Online Privacy Policy relates to the information collection and use practices of TBK in connection with our website located at <http://www.tbkbank.com> (the “Website”).

## Acceptance of Terms

By visiting our Website, you are agreeing to the terms of this Online Privacy Policy and the accompanying Terms and Conditions.

## The Information We Collect

In the course of operating the Website, TBK may collect the following types of information.

### 1. Personal Information

When you request information about our products and services or sign up to receive information from us, you may be required to provide us with personal information about yourself, such as your name, company, title, address, e-mail address, and phone number. We do not collect any personal information from you when you access and use the Website unless you provide such information voluntarily. All information we collect and/or receive under this section is collectively called “Personal Information.”

### 2. Other Information

In addition to the Personal Information, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

- a. **From Your Activity.** Information that we or our technology providers may automatically collect when you visit, access, and/or use the Website, such as your IP addresses, Internet service provider, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Website you visit, number of links you click while on the Website, search terms, and operating system.
- b. **From Cookies and JavaScript Tags.** Information that we may collect using “cookie” technology and JavaScript tags. Cookies are small files of data that a website stores on your device so that your device will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them) to help us collect Other Information and to enhance your experience using the Website. If you do not want us to place a cookie on your device, you may be able to turn that feature off on your device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Website may not function properly. We use JavaScript tags to trigger a sequence of events that includes viewing a first-party cookie (or setting that cookie if it does not already exist) and to help us tailor and optimize our Website and provide you relevant TBK advertisements outside of our Website.

## How We Use and Share the Information

We use the Personal Information and the Other Information (collectively, the “Information”) to administer our marketing programs; to improve our Website and services to you; to request your feedback; and to inform you about our products and services.

We may also use and/or share Information as described below.

- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- In an ongoing effort to better understand visitors to our Website and our services, we may analyze the Other Information in aggregate form in order to operate, maintain, manage, and improve the Website and/or our services. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.
- In order to provide our services and administer our marketing programs, we may share your Personal Information and Other Information with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.
- We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of TBK or others.

## Accessing and Modifying Information and Communication Preferences

You may manage your receipt of marketing and communications by clicking on the “unsubscribe” link located on the bottom of any TBK marketing e-mail. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

## Protection of Information

TBK will treat as confidential any information it collects. TBK maintains a Systems Security Program that provides guiding policies and procedures that promote practices and methodologies that protect the security and confidentiality of this information by limiting employee access to and use of this information.

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee that the Information that you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to or from the Website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

For more information regarding this policy, call us at 214-365-6900 and ask to speak with the Information Security Officer.

## Links to Third Party Sites

The Website may contain links to third-party websites. TBK has no control over the privacy practices or the content of these websites. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

### **Children's Privacy**

From our web pages, we do not knowingly collect personal information from individuals under the age of 13 without obtaining verifiable consent from their parents.

For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: [www.ftc.gov](http://www.ftc.gov).

### **Changes to This Online Privacy Policy**

This Online Privacy Policy is effective as of the date stated at the top of this policy. We may change this policy from time to time. By accessing and/or using the Website after we make any such changes to this policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Online Privacy Policy in effect at the time we collect the Information. Please refer back to this Online Privacy Policy on a regular basis.